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Hyatt, Marriott, Starwood, Agilysys, ATX, and Usablenet

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

AMERANTH, INC.,
Plaintiff,
v.
PIZZA HUT, INC., ET AL.,
Defendants.

CASE NOS. 11-cv-1810 JLS (NLS),
12-cv-742 JLS (NLS), 12-cv-739 JLS
(NLS), 12-cv-737 JLS (NLS), 12-cv-733
JLS (NLS), 12-cv-732 JLS (NLS), 12-cv-
731 JLS (NLS), 12-cv-729 JLS (NLS), 12-
cv-858 JLS (NLS), 12-cv-1659 JLS (NLS),
12-cv-1656 JLS (NLS), 12-cv-1655, JLS
(NLS), 12-cv-1654 JLS (NLS), 12-cv-1653
JLS (NLS), 12-cv-1652 JLS (NLS), 12-cv-
1651 JLS (NLS), 12-cv-1650 JLS (NLS),
12-cv-1649 JLS (NLS), 12-cv-1648 JLS
(NLS), 12-cv-1646 JLS (NLS), 12-cv-1644
JLS (NLS), 12-cv-1643 JLS (NLS), 12-cv-
1642 JLS (NLS), 12-cv-1640 JLS (NLS),
12-cv-1636 JLS (NLS), 12-cv-1634 JLS
(NLS), 12-cv-1633 JLS (NLS), 12-cv-1631
JLS (NLS), 12-cv-1630 JLS (NLS), 12-cv-
1629 JLS (NLS), and 12-cv-1627 JLS
(NLS)

**JOINT MOTION TO
ACCOMMODATE ROLLING
PRODUCTION OF DOCUMENTS**

AND RELATED CASES.

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1 Plaintiff Ameranth, Inc. (“Ameranth”), and defendants Papa John’s USA,
 2 Inc., Wanderspot, Expedia, Hotels.com, Hotel Tonight, Hotwire, Kayak, Orbitz,
 3 Travelocity, Fandango, StubHub, Ticketmaster, Live Nation, Micros, Pizza Hut,
 4 Domino’s, QuikOrder, GrubHub, O-Web, Seamless, Mobo OpenTable, Best
 5 Western, Hilton, Hyatt, Marriott, Starwood, Agilysys, ATX, and Usablenet
 6 (“Defendants”), bring this Joint Motion based on the following facts:

7 A. Ameranth served a round of Requests for Production of Documents on
 8 Defendants in February 2013, which were deemed served on April 1, 2013.
 9 Ameranth served another round of Requests for Production of Documents on
 10 Defendants on April 12, 2013.

11 B. In a June 7, 2013 Order Denying Plaintiff’s Ex Parte Motion for a
 12 Joint Discovery Conference [Doc. No. 388], the Court set a deadline of July 12,
 13 2013 for the parties to file any joint discovery motions regarding the Requests for
 14 Production.

15 C. The parties have met and conferred as required by the Court’s
 16 Chamber Rules regarding the Defendants’ responses and objections to Ameranth’s
 17 Requests for Production.

18 D. The Defendants have begun making rolling productions of non-
 19 privileged documents responsive to Ameranth’s Requests for Production.
 20 However, because of the scope and nature of the productions, such rolling
 21 productions are not yet complete, and the parties do not anticipate that they will be
 22 complete by July 12, 2013.

23 E. The parties wish to provide additional time for the Defendants to
 24 make their rolling productions of responsive documents, and for that reason now
 25 bring this joint motion.

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1 Dated: July 12, 2013

FULBRIGHT & JAWORSKI L.L.P.

2 By: /s/ Richard Zembek

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12 **Ticketmaster, Live Nation and Micros**

13 **and Liaison Attorneys for Defendants:**

14 **Pizza Hut, Domino's, QuikOrder, GrubHub,**
15 **O-Web, Seamless, Mobo, Best Western, Hilton,**
16 **Hyatt, Marriott, Starwood, Agilysys, ATX, and**
17 **Usablenet**

18 SIGNATURE CERTIFICATION

19 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative
20 Policies and Procedures Manual, I hereby certify that the content of this document
21 is acceptable to Richard Zembek, lead counsel or liaison counsel for Defendants,
22 and that I have obtained Mr. Zembek's authorization to affix his electronic
23 signature to this document.

24 /s/ William J. Caldarelli

25 William J. Caldarelli